Comptroller General
of the United States

Washington, D.C. 20548

Decision

Matter of: Microcosm, Inc.

File: B-277326; B-277326.2; B-277326.3; B-277326.4; B-277326.5

Date: September 30, 1997

Alfred J. Verdi, Esq., for the protester.
Timothy A. Harness, for Summa Technology, Inc., and John R. Grady, for Universal Space Lines, the intervenors.
Vincent A. Salgado, Esq., and Louis R. Durnya, Esq., National Aeronautics & Space Administration, for the agency.
Christina Sklarew, Esq., and Paul Lieberman, Esq., Office of the General Counsel, GAO, participated in the preparation of the decision.

DIGEST

Where protester's proposal under broad agency announcement failed to include sufficient technical information to establish viability of proposed research, agency reasonably determined that technical success was improbable and properly determined not to fund proposal.

DECISION

Microcosm, Inc. protests the National Aeronautics & Space Administration's (NASA) evaluation and rejection of its proposal under NASA research announcement (NRA) 8-19, issued for low-cost earth-to-orbit transportation systems research proposals. Microcosm alleges that NASA failed to evaluate the protester's proposal fairly, failed to communicate with the protester regarding certain aspects of its proposal, relaxed certain of the NRA requirements for the awardees, and used competitive procurement evaluation procedures which were not appropriate for NRAs.

We deny the protest.

This procurement was conducted under NASA's Broad Agency Announcement (BAA) authority contained in NASA Federal Acquisition Regulation Supplement (NFARS) § 1835.016-70. A BAA is a contracting method by which government agencies can acquire basic and applied research. BAAs may be used by agencies to fulfill requirements for scientific study and experimentation directed toward advancing the state of the art or increasing knowledge or understanding rather than focusing on a specific system or hardware solution. A BAA is considered a competitive procedure and meets the requirements for full and open competition if

it is general in nature, identifying areas of research interest including criteria for selecting proposals; solicits the participation of offerors capable of satisfying the government's needs; and provides for peer or scientific review. Federal Acquisition Regulation (FAR) § 6.102(d)(2). Unlike sealed bidding and other negotiated procurement methods, a BAA does not contain a specific statement of work and no formal solicitation is issued. In addition, the issuing agency is under no obligation to award any contracts and there is no common due date for proposals. Instead, the agency identifies a broad area of interest within which research may benefit the government and publishes its desire to contract for such research. Private organizations are then invited to submit their ideas within a certain period of time. The offerors who submit proposals are not competing against each other but rather are attempting to demonstrate that their proposed research meets the agency's requirements. The agency may decide to fund those efforts and award contracts to those offerors who submit ideas which the agency finds suitable. See FAR § 35.016.

The BAA at issue is under NASA's Bantam System Technology Project, the first phase of which was conducted under NRA 8-15, which focused on other aspects of the project such as developing and demonstrating, in ground tests, low cost components for propulsion systems, adapting commercial manufacturing practices, utilizing commercial off-the-shelf hardware, and other similar requirements. This NRA, for Phase II, is intended to continue the technology maturation process by demonstrating low recurring-cost technologies with a focus on flight demonstrations.[1] NRA 8-19, in relevant part, solicited proposals for innovative technology development and flight demonstration to enable significant cost reduction in transporting small payloads to low earth orbit. The NRA expressed NASA's goal for a new Bantam transportation system of delivering small payloads (150 kilograms) to low earth orbit (200 nautical miles sun synchronous) for a recurring price of $1.5 million beginning in 2001. The Bantam System Technology Project was divided into two proposal cycles. Cycle One proposals were for a 6-month effort for initial design and business plan development, with Cycle Two proposals to be for flight demonstrations.[2] This protest concerns the first of the two cycles.

Offerors were invited to propose any transportation system architecture or concept (e.g., reusable, partially reusable, expendable, liquid, hybrid, or solid propellants) that would best approach or accomplish NASA's goal. Different architectures and innovative concepts were encouraged, and both existing and new technologies were

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[1]The NRA solicited proposals in three separate areas; only the first area, for Bantam Technologies, is relevant here.

[2]Cycle Two, for flight demonstration, will be acquired competitively and Microcosm will be eligible to compete for that phase as well.

acceptable. The NRA stated that "[m]ultiple awards are planned for each cycle and it is undesirable for NASA to have more than one contractor working on identical architectures or concepts."

Offerors were required to submit a technical description of their planned system and a business plan for the operation of the system on a commercial basis. The NRA listed representative parameters to be defined in the technical and business plan areas of the proposals. Offerors were also instructed to include an overview of how they intended to accomplish the second phase, and the NRA stated that offerors selected for the first cycle must have the capability to accomplish the second cycle. The NRA included standard instructions for responding to NRAs and supplemental guidelines specific to this NRA. Offerors were warned that NASA might accept proposals without discussions and that proposals should therefore initially be as complete as possible and be submitted on the proposers' most favorable terms. The instructions stated that to be considered responsive, a submission must, at a minimum, present a specific project within the areas delineated by the NRA; contain sufficient technical and cost information to permit a meaningful evaluation; be signed by an official authorized to legally bind the submitting organization; not merely offer to perform standard services or to just provide computer facilities or services; and not significantly duplicate a more specific current or pending NASA solicitation. Proposals were to be evaluated under three principal factors, of approximately equal importance, described in the instructions as follows:

> Relevance to NASA's objectives: includes the consideration of the potential contribution of the effort to NASA's mission.
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> Intrinsic merit: includes the following factors:
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> 1. Overall scientific or technical merit of the proposal or unique and innovative methods, approaches, or concepts demonstrated by the proposal;
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> 2. Offeror's capabilities, related experience, facilities, techniques, or unique combinations of these which are integral factors for achieving the proposal objectives;
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> 3. The qualifications, capabilities and experience of the proposed principal investigator, team leader, or key personnel critical in achieving the proposal objectives;
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> 4. Overall standing among similar proposals and/or evaluation against state-of-the-art.

Evaluation of the cost of a proposed effort: includes the realism and reasonableness of the proposed cost and available funds.

A synopsis of the NRA was published in the Commerce Business Daily in January 1997, and the NRA was released in March. Twelve offerors, including Microcosm, submitted proposals for Bantam technology, Cycle One on April 30. NASA established a source evaluation team (SET) consisting of a technical panel, a business panel, and a cost panel to evaluate these proposals with panel members from three different NASA installations. Individual members of the panels conducted the initial evaluations; each panel then met, discussed the attributes of each proposal, and reached a consensus on their findings. The voting members reviewed the panel findings and reached a consensus on the strengths and weaknesses of each proposal and reported their findings to the source selection official (SSO). The SSO selected 4 of the 12 proposals for negotiations leading to award. Microcosm, whose proposal was not among those chosen, requested and received a debriefing, and this protest followed.

Microcosm protests that its proposal was misevaluated, in essence alleging that the proposal's strengths were not given sufficient credit in the evaluation and that the proposal should not have been downgraded for improperly identified weaknesses. In addition, Microcosm asserts that the agency was required to communicate with the protester to clarify any technical points and alleges that NASA introduced evaluation factors that were not disclosed in the NRA.

Proposals were not numerically scored. They were evaluated according to the factors listed in the NRA, and strengths and weaknesses were assessed. The evaluation record shows that NASA evaluators considered Microcosm's approach to be among the most complex of all the concepts that were submitted, and found that Microcosm's proposal failed to justify the added complexity and cost that this approach presented.

The evaluation of technical proposals is primarily the responsibility of the contracting agency; the agency is responsible for defining its needs and the best method of accommodating them and must bear the burden of any difficulties arising out of a defective evaluation. Avogadro Energy Sys., B-244106, Sept. 9, 1991, 91-2 CPD ¶ 229 at 5. In reviewing an agency's technical evaluation, we will not reevaluate the proposals; we will only consider whether the agency's evaluation was reasonable and in accord with the evaluation criteria listed in the solicitation. Herndon Science and Software, Inc., B-245505, Jan. 9, 1992, 92-1 CPD ¶ 46 at 3. A protester's disagreement with the agency's judgment is not sufficient to establish that the agency acted unreasonably. Id.

Microcosm proposed to design, test, qualify, and operate a [deleted] system that it calls the "Sprite." Microcosm has developed a family of expendable launch vehicles under a sounding rocket program called "Scorpius," based on research that was

performed, in part, under government contracts. The proposed Sprite launch vehicle, while not a part of the Scorpius group, is designed to build on the technology developed under the Scorpius program in order to reduce cost and risk factors. [Deleted].

Based on our review of the record, we find the agency's evaluation and consequent rejection of Microcosm's proposal reasonable. The evaluation record indicates that the evaluators generally had concerns both because there was insufficient information included in Microcosm's proposal to permit a clear understanding of the firm's approach, and because that approach was exceptionally complex.

Under the "Relevance to NASA's Objectives" evaluation factor, the fact that Microcosm's [deleted] was already in testing was deemed a significant strength. The status of the engine was considered particularly important, given the fact that [deleted]. The evaluators also identified the proposed leveraging of existing avionics as a strength; the proposal identified three key elements of the proposed [deleted] as being available from Microcosm's sounding rocket program. However, the evaluators had concerns regarding the remaining [deleted], as well as the placement of the [deleted], for which they did not find adequate description in the proposal.

The SET found three significant weaknesses (the [deleted] in the system; the use of [deleted]; and research repetitive of NASA/Air Force contract programs) and six other weaknesses ([deleted] that were considered unrealistic, the retention of data rights, and four arising from technical areas with insufficient proposal detail) under this evaluation factor.

The first of the significant weaknesses concerned the [deleted], which NASA considered to be insufficiently explained. [deleted]. In addition to the fact that Microcosm's overall vehicle design was considered one of the most complex of the 12 vehicle designs proposed, the SET found that the first-stage pod design was much more complex than the level of engineering detail in the Microcosm proposal would explain. During NASA's review of the proposal, specialists in system design, main propulsion system design, structural design, structural analysis, avionics design, performance modeling, and operations from three NASA installations reviewed the proposal. The proposal did not convince these specialists that the proposed design adequately supported the proposed manufacturing approach or had lower recurring-cost potential. Although the [deleted] was one of the most unique features of Microcosm's proposed vehicle, it was one of the least completely described features in the proposal. In view of the complexity and importance of the [deleted], NASA concluded that Microcosm's failure to adequately address it in its proposal was a significant weakness.

Microcosm takes the position that [deleted] "is used in various configurations on nearly all launch vehicles worldwide including Shuttle, Titan [and others]" takes

exception to the agency's characterization of this aspect of Microcosm's design as a "unique feature." In response, NASA points out that it is not the use of [deleted] per se that is considered to add complexity. Rather, NASA explains that under the protester's concept, [deleted] are dependent on other [deleted] for oxidizer; half of the [deleted] have engines (causing them to lift or push) while the remaining [deleted] drag or pull; in addition, the [deleted] are individually jettisoned, requiring piping to be disconnected and shut off in a very precise and complicated manner. The agency has provided a chart comparing key characteristics in Microcosm's design to two other [deleted], to illustrate its basis for concluding that Microcosm's design was unusually complex. The chart compares attributes such as number of stages, propulsion system type, complexity of engines (by number of parts), ignition systems, and thrust vector control. In nearly every category, the Sprite vehicle is more complex. While these comparisons are not dispositive of whether the Sprite design would achieve the agency's goal, they support the agency's position that in the absence of sufficient additional information explaining the complexity (or demonstrating that the design is not as complex as it appears), the SET reasonably concluded that these unexplained complexities represented a significant weakness.

Microcosm argues that comparing systems by their parts count is not the only way to determine whether a design is complex or simple; rather, low-cost elements, such as the engine, and design features, such as a low number of moving parts, should also be considered. Microcosm argues, for example, that although its design includes [deleted], rather than the [deleted] that NASA has cited in its comparisons, it is more relevant to the issue of simplicity that [deleted]. However, the information that Microcosm now provides was not provided in its proposal.[3] In addition, NASA points out that at least one of the systems used in its comparison has engines with only six parts; moreover, both engines in this design have been tested, whereas only one of Microcosm's engine designs has been tested.

Throughout the evaluation and agency report, it is clear that NASA considered a number of features of the Sprite design to be engineering challenges that could not be understood without substantially more data disclosure; in short, the proposal did not adequately explain the approach. Although Microcosm has attempted in its protest submissions to provide additional information to explain certain aspects of its proposal, this information does not change the validity of the proposal's evaluation, since the agency could only evaluate proposals on the basis of the

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[3]Microcosm repeatedly and inaccurately asserts that certain information was in fact included in the proposal. For example, the protester alleges that "specific facts" concerning its engines--parts count, man-hour estimates, and comparison pricing with other engines--were included in its proposal; however, the support cited for this assertion is to a journal article listed only as a reference in one of the proposed employee's resumes included in the proposal. We do not consider this information to have been included in the proposal in any useful way.

information they contained when they were submitted. It is an offeror's responsibility to submit an adequately written proposal in order to establish that what it proposes will meet the government's needs; an offeror runs the risk of having its proposal rejected if the proposal submitted is inadequately written. See Herndon Science and Software, Inc., supra, at 4.

Identified as Microcosm's second significant weakness was the [deleted], which NASA believed would lower reliability and increase the cost of the system. Although the NRA clearly welcomed innovative design approaches and permitted any type of vehicle configuration, the solicitation also made it clear that whatever configuration was proposed would be evaluated in terms of its ability to advance the NRA's stated mission--to enable significant cost reduction in transporting small payloads to low earth orbit. NASA believed this design, which was the only one it received that proposed the use of [deleted], would generally increase vehicle processing time, reduce reliability, and increase recurring cost due to duplication of systems, increase in overall vehicle complexity, and high parts count. As an example of one of its concerns with the multi-stage Sprite design, NASA notes in its report that in order to [deleted]. Thus, the agency concluded that the [deleted], the higher the cost and reliability risk. The Sprite's [deleted] design requires [deleted] systems, in addition to individual separation systems for each of the [deleted].

In response to the agency's analysis, Microcosm asserts that NASA has raised a "broad philosophical argument with no basis in engineering fact or support in traditional launch vehicle design." The thrust of Microcosm's response is that NASA has ruled out any multi-stage design, and that this is an arbitrary restriction, inconsistent with the terms of the NRA. On the contrary, these concerns are reasonably related to the NRA requirements. NASA's concerns, discussed above, are similar to the concerns expressed regarding the [deleted]: that the design is particularly complex; that the complexities are not justified by any explanations in the proposal; and that the complexities are inconsistent with achieving the stated goal of lowering costs. We conclude that NASA's evaluation in this area was reasonable and consistent with the NRA.

The third significant weakness identified under this factor was NASA's concern that funding the proposed effort would be repetitive of contracts that Microcosm had with the Air Force and with NASA. Microcosm's proposal states that the Scorpius program is currently funded under multiple contracts, including ones with NASA, which call for initial launch of two suborbital vehicles within the next year; these launches would provide the system level test-bed for the Sprite. While NASA appreciated that the use of existing and already funded technologies proposed by Microcosm would reduce the element of risk to a certain extent, and assigned the proposal a significant strength on this basis, the evaluators did not want to fund a second demonstration of these technologies on what they considered to be only a slightly different scale. NASA viewed this duplication of effort as analogous to the

duplication that would occur if two contractors were working separately on identical technologies or concepts, which the NRA expressly discouraged.

Microcosm points out that the NRA advised offerors that both existing and new technologies would be acceptable, and reasons that the proposed technology from existing programs should be acceptable. Microcosm concedes that its current contracts use the [deleted] now being developed in single stage suborbital flights, but distinguishes the efforts by noting that these flights do not test the [deleted] or the [deleted], nor any other aspects crucial to the Sprite system.

We find no basis to question NASA's assessment of a significant weakness due to other similar contracts Microcosm holds. Since NASA's purpose in trying to avoid the award of two contracts to two different contractors for the same approach is to expend research funds only on truly innovative concepts, it is reasonable to conclude that the same purpose is served by preventing one contractor from performing the same (or substantially similar) work under more than one contract.

The agency also identified various other weaknesses, including the absence of any [deleted]; [deleted] detail that was minimal; the failure to address [deleted]; [deleted]; and structural mass fractions proposed for the first and second stages, the achievability of which the evaluators doubted.[4] The evaluators also expressed doubt regarding the achievability of the proposed [deleted], which was the final weakness identified in this area. In sum, these weaknesses were all based on NASA's conclusion that additional basic engineering data was necessary to demonstrate the viability of the system and to validate Microcosm's claims of system simplicity.

Based on our review of the record in each of these areas, we consider reasonable NASA's conclusions regarding the paucity of detail in the protester's proposal. For example, the report explains the weakness rating for the failure to provide any [deleted] in the proposal as follows:

> A propulsion system consists of engines, tanks to hold propellants, a pressurization system to move fluids around the vehicle, and a plumbing and control system connecting the tanks and the engines. Typically this information is portrayed on a fluid, or gas, system schematic. The main propulsion system must provide for loading and unloading of rocket propellant from each stage, loading and unloading liquid oxygen from each stage, loading and unloading pressurization gases from each stage, pre-start

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[4]The evaluators were unable to arrive at a more certain conclusion because of the low level of detail in the proposal for the structure and main propulsion system.

> chill functions, engine start and operation, engine shutdown, and system preparations for staging. The evaluation team identified the lack of a [deleted] as a weakness in the offeror's proposal.

Microcosm acknowledges that it included no [deleted] in its proposal, asserting that the NRA did not expressly require this information and that [deleted] is common to all launch vehicles, rather than being unique to the Microcosm design. Although this information was not specifically required, the NRA did require that proposals contain sufficient technical information to permit a meaningful evaluation. We find reasonable the agency's explanation regarding the importance of this information for the purpose of validating the firm's claims of system viability and simplicity.

Responding to the weakness ratings generally, Microcosm asserts that while "the central theme of the NASA evaluation is the complexity of the Microcosm design," Microcosm in fact "identified design simplicity as one of the major strengths." However, the primary support in the proposal for simplicity of design consists of the protester's conclusory statements to that effect. For example, Microcosm states in its proposal, "We anticipate more than a factor of [deleted] than a traditional vehicle with almost no [deleted]. If funding proceeds for the Scorpius program, we anticipate being able to reduce total launch costs by a factor of [deleted] with commercial operation beginning in [deleted]. . . ." Microcosm lists the requirements established in the NRA for payload capacity, orbit, and price per mission and then lists "Microcosm Design Capability" next to that list, matching its projected capability to each of the stated requirements. The proposal concludes that "Microcosm meets the above economic and performance goals with a [deleted] that will be made from major assemblies developed over the past 4 years for low cost rockets." These unsupported assertions, however, do not demonstrate that the system it is proposing will perform as represented. It is the offeror's responsibility to submit an adequately written proposal in order to establish that what it proposes will meet the government's needs; this principle is particularly important where research is to be undertaken into new concepts. See Herndon Science and Software, Inc., supra, at 4.

Microcosm also protests that NASA improperly assigned a significant weakness to its business plan, which the agency considered to be incomplete. The record shows that, although the NRA required offerors to identify certain parameters for the system in its first 10 years of operation, such as expected annual revenues and expenses, Microcosm only showed 4 years of the life cycle in its plan, from which the values for the missing years could not be determined. NASA also was concerned that the lack of information about initial nonrecurring expenses would preclude determining the rate of return. Revenue and expenses, shown as total amounts, provided no way to determine what was included, and "other revenue" entries included no explanation of their source or content. As a related weakness, the evaluation noted that little basis was provided for the projection of [deleted]

flights per year; this rate, which is higher than the current rate, was not supported by trend data or market research information.

NASA also identified Microcosm's failure to grant NASA [deleted] as a significant weakness. The NRA warned offerors that "restrictions on resulting technology are highly discouraged and will be considered in the evaluation." Microcosm stated in its proposal that NASA would acquire unlimited rights to all inventions developed under the contract; however, Microcosm also retained certain rights for itself in its proposal, stating, for example, that

> [Deleted].

The protester opines in its proposal, further, that "in order for commercial funding to occur, it is critical that [deleted] be retained by SSLC."[5]

Based on our review of the record, we find no basis to question the reasonableness of the agency's evaluation with regard to Microcosm's incomplete business plan and its failure to grant unlimited data rights.

Microcosm also protests that NASA violated NFARS § 1835.016-70(e)(4) by failing to communicate with Microcosm to clarify areas of its proposal that were unclear. This regulation provides, in relevant part:

> After receipt of a proposal and before selection, scientific or engineering personnel shall communicate with an offeror, regarding the proposal, only for the purpose of clarification, as defined in FAR 15.601, or in order to understand the meaning of some aspect of the proposal that is not clear, or in order to obtain confirmation or substantiation of a proposed approach, solution, or cost estimate.

Microcosm argues that this provision required NASA to communicate with the protester, particularly in connection with those areas of the proposal that were considered lacking in technical information or detail. We disagree.

The operative language, quoted above, describes the only purposes for which communication with an offeror is permitted; it does not, as the protester urges,

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[5]In addition to restricting rights, this statement also draws into question the exact relationship between the Scorpius and Sprite projects and would appear to support NASA's concern that research under the two programs could be duplicative. To the extent the line between the two is imprecise--as demonstrated by the discrepancy in opinion between NASA and Microcosm expressed in the course of this protest--the line between data rights arising under one project or the other would also be imprecise.

require that communications occur. Here, the NRA explicitly warned offerors that the agency might accept proposals without discussion and that proposals should initially be as complete as possible and be submitted on the proposer's most favorable terms. NASA did not communicate with any offerors before it made its selections.

Microcosm also protests that NASA introduced "other competitive procurement evaluation procedures," alleging that the agency improperly created three categories of proposals (high potential, potentially viable, and not viable) and followed procedures similar to ones used by the Air Force. We find this allegation without merit. First, there is no prohibition in the NFARS, the NRA, or applicable portions of the FAR, against sorting proposals into categories during the process of evaluation and source selection. We do not agree with Microcosm's premise that this act constituted a competitive range determination. Second, there is no evidence of any impropriety in the selection process.

Taken together, the strengths and weaknesses identified in Microcosm's proposal reasonably support the SET's decision to reject Microcosm's proposal. Accordingly, the issues raised in Microcosm's initial protest are denied.

Microcosm raised a number of additional issues in comments and supplemental protests, which we dismiss for the reasons explained below.

Several of Microcosm's supplemental protest grounds concern the evaluation of other offerors' proposals. However, unlike the situation that exists under a negotiated procurement, offerors who submit proposals under a BAA are not competing against each other, and thus the various issues Microcosm has raised regarding the evaluation of other offerors' proposals are not for consideration.[6] See FAR § 35.016.

In comments filed under its initial protest, Microcosm raised two new issues, alleging a "prejudicial assignment of adjectival ratings" and "random gradings not related to the NRA requirements or the evaluation factors." Because these were not raised within 10 days of when the protester first became aware of their basis (in the agency report), they are supplemental protest grounds which fail to independently satisfy our timeliness requirements. Although Microcosm received an extension of time for filing its comments on the agency report, such an extension did not have the effect of waiving the timeliness requirements for filing bid protests; notwithstanding the extended comment due date, any protest allegations based on

[6] We also find without merit the protester's allegations of unequal treatment among offerors; since we have concluded that NASA's treatment of Microcosm's proposal was reasonable, the evaluation of other offerors' proposals is irrelevant, and no credible claim of bias has been raised.

information in the agency report had to be filed no later than 10 days after Microcosm received the agency report. Accordingly, these new issues are untimely. Management Tech., Inc., B-257269.2, Nov. 8, 1994, 95-1 CPD ¶ 248 at 10.

After receiving a supplemental agency report in response to Microcosm's second supplemental protest on August 12, Microcosm filed a third supplemental protest on August 22. In this protest, Microcosm alleges that proposals were evaluated in an unequal manner (including objections to individual ratings); and that the evaluation was inadequately documented and the source selection decision inadequately justified; and that NASA conducted discussions with only the awardees, allegedly violating a duty to open discussions with all offerors. On September 18, Microcosm filed its fourth supplemental protest, based on statements contained in a request filed by the agency seeking dismissal of certain supplemental issues. This latest protest alleges a reversal in the agency's position regarding issues raised in the penultimate supplemental protest.

We dismiss these issues. Several of the allegations involve the evaluation of the selectees' proposals and therefore, as explained above, do not form a valid basis of protest in a procurement under a BAA. To the extent the newly-raised issues are based on information contained in the initial agency report, which Microcosm received on July 30, they are untimely filed. Moreover, allegations that NASA failed to follow its source selection plan fail to state a valid basis for protest, since the source selection plan provides internal agency guidance and does not establish legal rights and responsibilities such as to make actions taken contrary to those statements subject to objection. See Indian Resources Int'l, Inc., B-256671, July 18, 1994, 94-2 CPD ¶ 29 at 3; Motorola, Inc., B-247937.2, Sept. 9, 1992, 92-2 CPD ¶ 334 at 5. New issues concerning the production of individual evaluators' worksheets to document the evaluation fail to state a valid basis of protest since, as explained above, the consensus reports and source selection decision were consistent with the NRA; since the evaluators' notes and scoring sheets are not necessary to judge the rationality of the evaluation that is otherwise adequately documented, an examination of individual scoresheets would be irrelevant here. See Hydraudyne Sys. and Eng'g, B.V., B-241236, B-241236.2, Jan. 30, 1991, 91-1 CPD ¶ 88 at 4-5.

The protest is denied.

Comptroller General
of the United States